

**June 29, 2022**

**Re: Completeness Questions- Clarkview Surgery Center CON Matter No. 22-04-2454**

Charity Care 1.

Regarding the response provided for question 8 in the first set of completeness questions, please provide a response for Standard .05(A)(3)(c) Charity Care Policy (below).

(c) A proposal to establish or expand an ASF for which third party reimbursement is available, shall commit to provide charitable surgical services to indigent patients that are equivalent to at least the average amount of charity care provided by ASFs in the most recent year reported, measured as a percentage of total operating expenses. The applicant shall demonstrate that: Shari Cohen June 24, 2022 Page 2 mhcc.maryland.gov

(i) Its track record in the provision of charitable health care facility services supports the credibility of its commitment; and

(ii) It has a specific plan for achieving the level of charitable care provision to which it is committed.

(iii) If an existing ASF has not met the expected level of charity care for the two most recent years reported to MHCC, the applicant shall demonstrate that its historic level of charity care was appropriate to the needs of the service area population.

The Clarkview Surgery Center is used by Cosmetic Surgeons who perform cash based elective services. Due to the types of services provided, charitable requests have not been made to the Clarkview Surgery Center therefore, we have been unable to provide charitable services. If a provider were to inquire about performing a charitable service at the Clarkview Surgery Center, we would certainly oblige based off our established Charity Care Policy (Attachment F).

Impact on Existing Providers 2. Regarding the response provided for question 28 in the first set of completeness questions, please provide an analysis of the impact of the proposed project in accordance with Standard 10.24.01.08G(3)(f) (below). Please assure that all sources of information used in the impact analysis are identified and identify all the assumptions made in the impact analysis with respect to demand for services, payer mix, access to service and cost to the health care delivery system including relevant populations considered in the analysis, and changes in market share, with information that supports the validity of these assumptions. Provide an analysis of the following impacts: (a) On the

volume of service provided by all other existing health care providers that are likely to experience some impact as a result of this project; In your answer, include why and how you came to your conclusions

As referenced in the initial application and response 1, there will not be an impact on existing facilities. The third room will be used by surgeons who are currently utilizing the Clarkview Surgery Center. The room will be used to eliminate the extended wait lists that our surgeons currently hold. In addition, there is not a like facility in the general area who provides a financially feasible option for patients.